1

2

3

4 5

6

7

9

10

11 12

13

14

1516

17

18 19

20

2122

23

24

25

26

Paul J. Anderson (NV SBN 709) MAUPIN, COX & LEGOY

4785 Caughlin Parkway P.O. Box 30,000 Reno, NV 89519/89520 (P.O. Box)

Attorneys for Defendants

panderson@mcllawfirm.com

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

EVAN PARKER,

Plaintiffs,

VS.

DAMON ZAVALA, et al.,

Defendants.

Case No. 3:24-cv-00300-MMD-CSD

MOTION FOR EXTENSION OF TIME FOR DEFENDANT NURSE NICOLE VON JAEGER TO RESPOND TO COMPLAINT (FIRST REQUEST)

Pursuant to Fed. R. Civ. P. 6 and this Court's Local Rules ("LR") of Practice LR IA 6-1 and LR 7-1, Defendant, Nurse Nicole Von Jaeger ("Von Jaeger" or "Defendant"), submits this Motion for Extension of Time for Defendant Nurse Nicole Von Jaeger to Respond to Complaint (First Request), to extend the deadline for Nurse Von Jaeger to respond to the Complaint [ECF No. 8] by 30 days to <u>August 21, 2025</u>. The Declaration of Paul J. Anderson, Esq., is attached as Exhibit "1," in support of this Motion, and to verify the matters set forth below, as follows:

- 1. Plaintiff Evan Parker ("Plaintiff") filed his initial Complaint in the United States District Court for the District of Nevada on August 22, 2024, and then again on June 13, 2025, following entry of this Court's Screening Order. [ECF 7].
- 2. On June 30, 2025, the United States Marshall's office served the Summons and Complaint upon the Lyon County Sheriff's Office. Nurse Von Jaeger does not work for the Lyon County Sheriff's Office but instead for Recon Health Services, the private entity that provides medical care and services to inmates at the Lyon County Detention Center, ("LCDC"). Nurse Von Jaeger did not receive the summons from the Lyon County Sheriff's Office until later in the

(775) 827-2000 www.mcllawfirm.con 2

3

4 5

6

7

8 9

10

11 12

13

14

15

16

17

18

19

20 21

22

23

24

25

26

week of July 7, 2025.

- 3. On July 17, 2025, the undersigned counsel for Defendant was first made aware of the Service of the Complaint on Nurse Von Jaeger.
- 4. Pursuant to Fed.R.Civ.P. 81(c), the deadline for Nurse Von Jaeger to respond to the Complaint is July 21, 2025.
- 5. Legal counsel for Nurse Von Jaeger needs an additional thirty (30) days from July 21, 2025, to review the Complaint and any underlying pleadings, papers and orders, as well as any material documents, including medical records, and to consult with Nurse Von Jaeger to prepare a proper response to the Complaint.
- This is the first request for an extension of time to respond to Plaintiff's Complaint, 6. and this request is made in good faith and not for purposes of delay.

Based on the foregoing, Nurse Von Jaeger respectfully requests this Court grant this motion and enter an order extending Nurse Von Jaeger's time to respond to Plaintiff's Complaint by thirty (30) days, to August 21, 2025.

Respectfully, submitted this 17th day of July, 2025.

/s/ Paul J. Anderson

Paul J. Anderson (NV SBN 709)

MAUPIN, COX & LEGOY

4785 Caughlin Parkway P.O. Box 30,000

Reno, NV 89519/89520 (P.O. Box) panderson@mcllawfirm.com

IT IS SO ORDERED.

DATED: July 18, 2025.

Craig S. Denney

United States Magistrate Judge